

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
Defendant.)	

JOINT STIPULATED SCHEDULE FOR CONTEMPT PROCEEDINGS

Pursuant to the Court's Order (Dkt. No. 803) directing the parties to submit a schedule for discovery and further proceedings concerning Plaintiff *ePlus Inc.*'s ("*ePlus*") allegation that Defendant Lawson Software, Inc. ("*Lawson*") is in contempt of the Court's permanent injunction, *ePlus* and Lawson jointly submit the following schedule for contempt proceedings.¹

DATE	EVENT
Oct. 7, 2011	Lawson Responses to Written Discovery from <i>ePlus</i>
Oct. 17 – Nov. 18, 2011	Fact and Expert Depositions
Nov. 28 – 30, 2011	Evidentiary Hearing
Dec. 16, 2011	<i>ePlus</i> Post-Hearing Opening Brief
Dec. 23, 2011	Lawson Post Hearing Opposition Brief
Dec. 30, 2011	<i>ePlus</i> Post-Hearing Reply Brief

¹ Lawson notes that if the Court denies *ePlus*'s pending Motion to Show Cause why Lawson Should Not be Held in Contempt, the schedule set forth herein would not be necessary.

The parties respectfully request that in the event the Court is unavailable to resolve any discovery disputes that arise prior to the evidentiary hearing, the parties be permitted to seek the assistance of U.S. Magistrate Judge Dennis Dohnal in resolving any such disputes.

The parties also note that the briefing schedule set forth above has been agreed upon in light of the representation by counsel for Lawson that they have a trial scheduled from December 6 until December 16, 2011. The parties have agreed that if that trial does not take place as scheduled, the deadlines for the post-hearing opening brief, opposition brief, and reply brief will be rescheduled for December 9, December 16, and December 22, 2011, respectively.

A proposed scheduling order is attached as Exhibit A.

September 27, 2011

Respectfully submitted,

ePlus Inc. and

Lawson Software, Inc.

By Counsel

/s/

Dabney J. Carr, IV (VSB No. 28679)
Robert A. Angle (VSB No. 37691)
Megan C. Rahman (VSB No. 42678)
dabney.carr@troutmansanders.com
robert.angle@troutmansanders.com
megan.rahman@troutmansanders.com
TROUTMAN SANDERS LLP
1001 Haxall Point, Richmond, VA 23219
Telephone: (804) 697-1200
Facsimile: (804) 697-1339

Daniel McDonald (admitted pro hac vice)
William D. Schultz (admitted pro hac vice)
Rachel C. Hughey (admitted pro hac vice)
Andrew J. Lagatta (admitted pro hac vice)
MERCHANT & GOULD P.C.
3200 IDS Center, 80 South Eighth Street,
Minneapolis, MN 55402
Telephone: (612) 332-5300
Facsimile: (612) 332-9081

Donald R. Dunner (admitted pro hac vice)
Erika H. Arner (admitted pro hac vice)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
901 New York Avenue, N.W.
Washington, DC 20001
Telephone: (202) 408-4000
Facsimile: (202) 408-4400

Attorneys for Defendant Lawson Software,
Inc.

/s/

David M. Young (VSB #35997)
Scott L. Robertson (admitted pro hac vice)
Jennifer A. Albert (admitted pro hac vice)
GOODWIN PROCTER LLP
901 New York Avenue, N.W.
Washington, DC 20001
Telephone: (202) 346-4000
Facsimile: (202) 346-4444
dyoung@goodwinprocter.com
srobertson@goodwinprocter.com
jalbert@goodwinprocter.com

Craig T. Merritt (VSB #20281)
CHRISTIAN & BARTON, LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095
Telephone: (804) 697-4100
Facsimile: (804) 697-4112
cmerritt@cblaw.com

Michael G. Strapp (admitted pro hac vice)
GOODWIN PROCTER LLP
Exchange Place
53 State Street
Boston, MA 02109-2881
Telephone: (617) 570-1000
Facsimile: (617) 523-1231
mstrapp@goodwinprocter.com

Attorneys for Plaintiff ePlus Inc.